



## Paducah Citizens Advisory Board

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### **Recommendation 13-08: Importance of Safety and Cost Benefits by Initiating Immediate D&D Using Current Workforce**

July 18, 2013

#### **Background**

The United States Enrichment Corporation ceased producing enriched uranium at the Paducah Gaseous Diffusion Plant (PGDP) on May 31, 2013. The once-operational uranium enrichment facility is in the process of shutting down. Highly trained and experienced workers, knowledgeable in how to work safely in a massive industrial setting, will soon be terminated. In addition, DOE's current cleanup contractor, LATA-KY, is facing impending layoffs due to uncertain budgetary constraints. LATA-KY has recently surpassed 2 million safe work hours in the midst of complicated work within the C-340 and C-410 building complexes.

USEC and LATA-KY's skilled workforce is intimately familiar with the PGDP facility and decontamination and decommissioning (D&D) activities. USEC employees perform operations and maintenance tasks that are similar to process equipment preparation and removal tasks in D&D already being performed by LATA-KY personnel. All workers are also trained in Environmental Safety & Health issues that are important to the D&D effort. As a bonus, these workers have a safety culture mindset which has been promoted by their current employer. Their safety record at the PGDP is excellent. Workers that are available as a result of eminent layoffs would require a minimum of D&D-specific training and could move directly to D&D work. These workers also possess L or Q security clearances. By utilizing the current workforce, the DOE will realize significant savings in time and dollars in security clearing and training a new workforce. Current workers are uniquely qualified to become the labor pool for D&D of the PGDP operating facility.

As previously stated in Recommendation 13-04: *Prompt Initiation of PGDP Operating Facility Decontamination and Decommissioning after Transition of Leased Buildings to DOE*, at the K-25 Oak Ridge Gaseous Diffusion Plant, more than 10 years passed before serious D&D work began. During that time, much plant knowledge that would have been useful at the beginning of D&D was lost. DOE could avoid this mistake at Paducah by beginning D&D of the GDP promptly after the plant is returned from USEC.

As stated in Recommendation 13-05: *Seek Change to Budget Strategy and Funding Levels to Include Post Operations of the PGDP*, it is imperative that DOE adequately fund the PGDP post operation shutdown and move into the D&D phase of restoration of the site. DOE's FY 2015 budget for the Paducah site, including the DUF6 facility and current remediation, should be \$400 million in order to facilitate the ongoing missions and D&D the GDP. Long-term surveillance and maintenance (S&M) will result in the loss of a highly skilled, well trained, safety conscious

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work force who possess historical institutional knowledge. DOE must not repeat the mistakes of the 1985 K-25 shutdown.

Lessons learned from ongoing D&D of the Oak Ridge Gaseous Diffusion Plant and Portsmouth GDP illustrate the need to transition to immediate full scale D&D operations at Paducah. Several injuries or near-misses were directly related to delay of D&D activities and lack of worker knowledge.

- Deterioration of buildings due to long-term S&M lead to unsafe work environment.
- Serious safety events may have been avoided if a knowledgeable workforce with an ingrained safety culture had been utilized.
- DOE could have avoided the high cost of long-term S&M by initiating D&D of the GDP

### **Recommendation**

**The CAB recommends that DOE initiate immediate D&D of the operating facility upon return of the PGDP to DOE in order to maximize use of a knowledgeable and safety-conscious workforce. Utilization of this available workforce will return innumerable benefits to DOE, including:**

- **Safety-conscious workers use good work practices, which in turn contributes to lower project costs**
- **Experienced workers possess superior institutional knowledge and skillsets which contribute to a safer work environment**
- **Minimal training is necessary to prepare workers for D&D of the GDP**
- **Cost and time savings due to current workers possessing L or Q security clearances**

**Prompt initiation of D&D of the GDP rather than long-term S&M will:**

- **Minimize environmental risk to the host community**
- **Minimize lifecycle costs**